

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
1 SEAL HARBOR ROAD, APARTMENT 407)
WINTHROP, MASSACHUSETTS;)
ONE 2004 CADILLAC; AND)
\$13,808 IN UNITED STATES CURRENCY,)
Defendants.)

FILED UNDER SEAL

Civil Action No.

14-CV-10429-DJC
FEB 26 P 1:46
SUFFOLK COURTHOUSE
MASS.
U.S. CLERK'S OFFICE

VERIFIED COMPLAINT FOR FORFEITURE IN REM

The United States of America, by its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, in a civil action of forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 1955(d), alleges that:

1. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1335.

Venue is appropriate pursuant to 28 U.S.C. § 1395.

2. The defendant properties consist of:

- a. the real property located at 1 Seal Harbor Road, Apartment 407, Winthrop, Massachusetts, including all appurtenances and improvements thereon, as described in more detail in a deed recorded at Book 50983 and Page 194 of the Suffolk County, Massachusetts Registry of Deeds (the “Real Property”);
- b. one 2004 red Cadillac CTS sedan bearing Vehicle Identification Number 1G6DM577X40143200 and Massachusetts Registration RS702V (the “Vehicle”); and
- c. \$13,808 in United States currency seized from 1 Seal Harbor Road, Apartment 407, Winthrop, Massachusetts (the “Currency”);

(collectively, the “Defendant Properties”).

3. As detailed in the Affidavit of Federal Bureau of Investigation (“FBI”) Special Agent Matthew Riportella, which is attached as Exhibit A and incorporated herein by reference, the United States has probable cause to believe that the Currency constitutes or is derived from proceeds traceable to gambling in violation of 18 U.S.C. § 1955, and, therefore, is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C). Further the government has probable cause to believe that the Defendant Properties were property used in violation of 18 U.S.C. § 1955, and, therefore, are subject to forfeiture to the United States pursuant to 18 U.S.C. § 1955(d).

WHEREFORE, the United States of America requests:

1. That a Warrant and Monition, in the form submitted herewith, be issued to the United States Marshal for the District of Massachusetts, or his designee, commanding him to give notice to all interested parties to appear and show cause why the forfeiture should not be decreed;
2. That judgment of forfeiture be decreed against the Defendant Properties;
3. That thereafter, the Defendant Properties be disposed of according to law; and
4. For costs and all other relief to which the United States may be entitled.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney,

By:

MARY B. MURRANE
Assistant U.S. Attorney
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Date: February 26, 2014

Verification

I, Matthew Riportella, Special Agent, Federal Bureau of Investigation, state that I have read the foregoing Complaint for Forfeiture *in Rem* and the attached Affidavit, and the contents thereof are true to the best of my knowledge, information, and belief.


Matthew Riportella
Special Agent
Federal Bureau of Investigation

Date: February 26, 2014

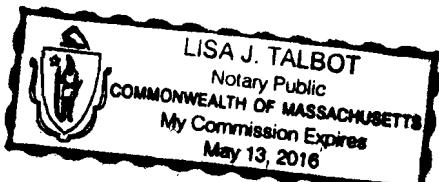
COMMONWEALTH OF MASSACHUSETTS

Suffolk, ss

Boston

On this 26th day of February, 2014, before me, the undersigned notary public, personally appeared Matthew Riportella, proved to me through satisfactory evidence of identification, which was government issued identification, to be the person whose name is signed on the preceding or attached document, and who swore or affirmed to me that the contents of the document are truthful and accurate to the best of his knowledge and belief.

Lisa J. Talbot



My commission expires May 13, 2016